

Submitted Via Email (naesb@naesb.org)

October 2, 2025

North American Energy Standards Board
1415 Louisiana Street, Suite 3460
Houston, Texas 77002

Re: Comments and Suggestions on the 2026 Annual Plan

North American Energy Standards Board:

The American Gas Association (“AGA”) appreciates the opportunity to provide these comments and suggestions in response to the September 10, 2025 Notice on the Preparation of the 2026 Annual Plans: Meeting Announcements, Agendas and Call for Comments. AGA requests that the Annual Plan Subcommittees consider including the following item in the appropriate annual plans.

AGA supports efforts to improve coordination, communications, and business practices to ensure reliability. The 2026 Annual Plans for the Wholesale Gas Quadrant (“WGQ”), Wholesale Electric Quadrant, and the Retail Markets Quadrant should further highlight the need for operating reliability for the natural gas system and the electric sector. The 2025 WGQ Annual Plan included Provisional Activity No. 3, which discussed the development and/or modification of business practice standards related to reliability and this same provisional item should continue in 2026, due to current activities in the natural gas and electric sectors. Accordingly, AGA requests that the following matter remain as a provisional activity for the 2026 WGQ Annual Plan:

Upon a request or as directed by NAESB Board or a relevant jurisdictional entity, consider developing and/or modifying business practice standards that reflect best practices that will provide stronger operating reliability from production/supply/transport during extreme weather conditions and more clear communications and business processes around force majeure declarations during critical operating periods.

The above provisional item should be included in the Wholesale Electric Quadrant and the Retail Markets Quadrant annual plans as well.

AGA supports efforts related to improving coordination, communications, and business practices to ensure reliability, and maintaining this provisional activity in the annual plan will ensure that this issue is ready to be worked on in 2026 if a request is made or as directed by the NAESB Board or a relevant jurisdictional entity. Such a request or directive could be forthcoming due to the federal administration’s focus on energy matters. Notably, the President has issued several energy related executive orders such as: Exec. Order No. 14156 Declaring a National Energy Emergency, Exec. Order No. 14154 Unleashing American Energy, Exec. Order No. 14213 Establishing the National Energy Dominance Council. Moreover, pursuant to the aforementioned executive orders, on June 30, 2025, DOE Secretary Chris Wright requested that the National Petroleum Council (“NPC”) undertake a gas-electric report, a broad “Future Energy Systems” study that leverages domestic oil and gas, to be delivered to the Secretary by December 2025. The letter directed the NPC to focus its attention on:

- Oil and Natural Gas Infrastructure Permitting. The NPC should update the 2019 Dynamic Delivery permitting section with practical, current recommendations to improve permitting and siting, including insights on investment and rapid deployment of new technologies that increase safety, integrity, or operational efficiency; and
- Gas-Electric Coordination. The NPC should assess how rising natural gas and electricity demand and shifting load patterns are straining natural gas pipelines in key regions of the United States; examine what impact these strains can have on energy reliability; and recommend actionable strategies to address the misalignment between these two industries that can prevent or mitigate reliability impacts.

Additionally, the Secretary directed the NPC to consider additional subcomponents, which may include topics on energy security, infrastructure security, and analyses supporting energy trade and competitiveness globally. Accordingly, the forthcoming NPC report will include recommendations on gas-electric matters that could have implications for NAESB. Therefore, because of the focus on energy issues at the federal level and the expected issuance of the NPC report with recommendations on gas-electric coordination issues it is appropriate to maintain the aforementioned provisional item in the 2026 WGQ Annual Plan, as well as the Wholesale Electric Quadrant and the Retail Markets Quadrant annual plans.

The American Gas Association respectfully requests that the Annual Plan Subcommittees consider these comments and suggestions as the 2026 Annual Plans are finalized. AGA looks forward to continuing to work with NAESB on these important matters.

Respectfully submitted,



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